

## EXHIBIT A

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
COURT OF COMMON PLEAS OF PHILADELPHIA

WALITYUDDIN S. ABDULLAH

v.

Civil Action No.

BANK OF AMERICA & WELLS FARGO BANK

150200227

Sharon Thain  
494-10068  
267-886-1044  
Received by US Mail  
1:07pm

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

*You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the offices set forth below to find out where you can get legal help.*

Philadelphia Bar Association  
Lawyer Referral  
and Information Service  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197

10-284

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo a partir de la fecha de la demanda y la notificación. Hace falta presentar una comparecencia escrita o en persona o con un abogado y entregar a la corte su firma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y pueda continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y resolver que usted cumpla con todas las providencias de esta demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

*Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar el servicio, Vaya en persona o llame por teléfono a la oficina o en dirección se encuentra escrita abajo para averiguar donde se pueda conseguir asistencia legal.*

Asociación De Licenciados  
De Filadelfia  
Servicio De Referencia E  
Información Legal  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197

**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
COURT OF COMMON PLEAS OF PHILADELPHIA**

**WALIYYUDDIN S. ABDULLAH**

**CIVIL ACTION**

**VS**

**NO.**

**THE SMALL BUSINESS BANKING DEPARTMENT  
OF THE BANK OF AMERICA &  
THE SMALL BUSINESS BANKING DEPARTMENT  
OF WELLS FARGO BANK**

**CIVIL ACTION**

**COMPLAINT**

### PRELIMINARY STATEMENT

From December 2012 through August 2014, I, the plaintiff, have repeatedly contacted the Bank of America and Wells Fargo's small business loan departments, for business loans to grow and expand my businesses. I informed both of these banks that I am a small business owner and that I am also a veteran, which qualified my businesses for preferential consideration, and that I wanted to apply for these loans under the Small Business Administration Patriot Express Pilot Loan Initiative, loan guarantee program.

From January 2013 through August 2014, each of these banks has consistently and without explanations refused me the right to even apply for a business loan. As a United States Citizen, I have every right to apply for a business loan. Our Constitution and Laws guarantee me the right to the full and equal benefits of these laws. One of these laws is the Small Business Administration guarantee loan programs.

A review of the Small Business Administration guidelines will show that I met their guidelines in 2013 and 2014. And, a review of these banks own web sites will show that I met the guidelines that they posted for the Small Business Administration loan guarantee programs. Yet, both of these banks have denied me my right to benefit from these programs.

The question before this Court is why have I been denied the **right to**, by these Defendants, **benefit** from my government's legislation?

### PLAINTIFF

I, Waliyyuddin S. Abdullah, am a natural citizen, of African -- American heritage and descent, of the United States of America. I am also a veteran of the United States Army. I reside at 2451 N. 19<sup>th</sup> Street, Philadelphia, Penna. 19132-4304. My home address is also currently my business address. My home phone number is 215-223-3549. My personal e-mail address is: [waliyyuddin@hotmail.com](mailto:waliyyuddin@hotmail.com)

My businesses names are the Islamic Communication Network, Inc and the Bilalian's Qur'anic Institute, Inc. The Islamic Communication Network, Inc was incorporated in the State of Pennsylvania in 1986. The Bilalian's Qur'anic Institute, Inc was incorporated in the State of Pennsylvania in 2012. The phone number for both of these businesses is 215-227-0640. The Islamic Communication Network, Inc e-mail address is: [islamiccomm.network@verizon.net](mailto:islamiccomm.network@verizon.net). The Bilalian's Qur'anic Institute, Inc e-mail address is [wbgifm@hotmail.com](mailto:wbgifm@hotmail.com).

### DEFENDANTS

The Bank of America is a national bank with branches across the United States. I will file all legal papers, until further notice, with its branch office located at:

- Bank of America  
C/o Branch Manager  
932 Chestnut Street  
Philadelphia, Pa. 19107

Wells Fargo Bank is a national bank with branches across the United States. I will file all legal papers, until further notice, with its branch office located at:

- Wells Fargo Bank  
C/o Branch Manager  
2240 Butler Pike  
Plymouth Meeting, Pa. 19462  
215-229-3680

**CAUSE OF ACTION**

I allege that these Defendants have violated the spirit and the letter of the law of the .  
Pennsylvania Human Relations Act.

## **ARGUMENT**

### **Argument: Against Bank of America:**

I contacted the Bank of America seeking a business loan. I was seeking this loan under the Small Business Administration (SBA) Guarantee Loan Program, a federal agency established, by federal law, to assist small businesses such as mine. I also informed the Bank that I was a veteran, and that there was an additional federal law that would benefit me in my application for a loan. This Bank has refused to honor my right to the benefits of these federal laws, that would improve the life of my family, my community and I, myself.

The following narrative narrates my inter-action with the Bank of America, to show that I have repeatedly attempted to exercise this legal right:

1. On December 5, 2012, I went to the Bank of America's branch, located at Broad & Cecil B. Moore Avenue, in Philadelphia, seeking a small business loan. At this branch, I talked to one of the bank's employees. After taking my information, about how much I want to borrow, this employee told me that they do not handle business loans at this branch, but that she had sent, by computer, my information to their department that handles small business loans. She also gave me the name of the person that would contact me, a Mr. Justin Davids. She said that he would be contacting you within 24 to 48 hours.
2. Mr. Davids called me, later on, that same day, and left a message for me, on my answering machine. I returned his call, the next day, on December 6, 2012. I explained to him, Mr. Davids, what I was looking for and that I wanted to apply under the Patriot Express Loan program. He told me that the bank only makes loans to businesses that have sales of \$250,000.00 per year. I told him that I did not have sales at that level, but that I wanted to borrow the money so that I could expand my business, with the intent of increasing my sales. He said, "I'll send you the information that the bank required". He said that I could e-mail all the information back to him.
3. I received an e-mail from Mr. Davis, on December 6, 2012, (see Exhibits #1 - #5).
4. In this e-mail, he, Mr. Davids, detailed all the information that he said that the bank would need "In order (for me) to apply for a line of credit".
5. I did not ask for a line of credit. Even though this was not the information that I had requested from the bank, I nevertheless completed these forms.

6. On December 28, 2012, I e-mailed to Mr. Davids all of the information that he had requested, these completed forms, and I also included a Loan Proposal, reiterating my request of, seeking a business loan of \$500,000.00 from the Bank of America, because I was not seeking a line of credit from the bank, (See Exhibits # 6 – 28).
7. On December 28, 2012, I received an instant automatic reply back from Mr. Davids' office stating that he was away on vacation and that he would not be back until January 2, 2013. I interpreted this automatic message as proof that my information had been received by the right office, (See Exhibit # 29).
8. By January 6, 2013, I had not received a reply from Mr. Davids; so, I called him, on January 6, 2013, and left a message, on his cell phone voice message machine, asking him to let me know the status of my loan request and would he call me back.
9. Mr. Davids never returned my phone call and I was never told the status of my loan request, by Mr. Davids neither in person or by letter.
10. Not to be deterred, because of this lack of response from Mr. Davids, I contacted the Bank of America again in August of 2013.
11. On August 14, 2013, I, the plaintiff, had a face to face meeting with Mr. Davids and this is how it happened.
12. On August 9, 2013, I, the plaintiff, went to the Bank of America's branch office located at 16<sup>th</sup> & J.F.K. Blvd, in Philadelphia. I told the bank employee what I was looking for, a business loan. He told me that they did not do business loans in that office, but that he would see if he could schedule an appointment for me.
13. I told him that, Wednesday, August 14, 2013, at 10: AM, was a good time for me. He put that information into the bank's computer system and told me that that time was fine and that you would be meeting with a Mr. Justin Davids, here at this branch on that date and time.
14. When I arrived at this bank branch on the date and time that I was scheduled for a meeting with Mr. Davids, he was not there. I informed the bank's employee that I had a meeting here at 10: AM, with a Mr. Davids.
15. This employee checked on the bank's computer system and confirmed that I did have an appointment. He, this bank employee, called Mr. Davids to remind him of this meeting. Mr. Davids assured him that he would be there in about ten minutes.



16. Mr. Davids did arrived and we were allowed to have our scheduled meeting in one of the offices cubicles there, at that branch. We met for about twenty minutes, because he, Mr. Davids, kept saying he had another meeting, and he even called that person to apology during our meeting and told him/her that he would be their shortly.
17. During our meeting, I told Mr. Davids about a new Project that I was working on and I was looking for how his bank could help me. I did not receive any kind of commitment for any kind of assistance at this meeting.
18. Instead, when our meeting ended, Mr. Davids gave me the name, address and phone number to the regional office of the Small Business Administration Lender Relationship Specialist, a Mr. John Xu, with the implied hint that he would help you better than he could.
19. Also, at this face to face meeting with Mr. Davids, there was no mentioning of a business having a sale volume of \$250,000.00 in order to qualify for a loan from them.
20. I called Mr. Xu later on that same afternoon and I left a message on his answering machine. He returned my call within a matter of minutes. I told him what I was looking for and he was very helpful and informative. And he repeated something that I already knew, the banks' loan you the money; we just guarantee the loan.
21. I had not further contact with Mr. Davids for the balance of 2013, because he was not responses to my requests.
22. In 2014, I decided to try seeking a business loan from Bank of America again because one of my businesses, the Bilalian's Qur'anic Institute received a license from the FCC, Federal Communication Commission, to build and operate a low power FM station in the State of Delaware.
23. On June 24, 2014, I e-mailed Mr. Davids a Loan Proposal entitled "Project Seedling Outline". I was seeking a loan of \$125,000.00 and that I was going to use this license, the property I was seeking to acquire and the radio broadcast equipment and studio they I was going to purchase as collateral for this loan, in addition to the SBA loan guarantee, (see Exhibit # 30).
24. As of the date of this filing, I have not received any type of response from Mr. Davids about this loan request for Project Seedling.
25. On August 4, 2014, at 9:50 AM, I called Mr. Davids.
26. He answered.
27. I talked to him about my need for another and different business loan and that I would e-mail him my information about this loan request. The loan proposal was called: Project Why Wait - Objectives & Goals".

28. I also told him, Mr. Davids, that I would, G\_\_d willing, call him back tomorrow, after he had looked over my information, to see where we can go from there. I e-mailed Mr. Davids the Loan Request, (see Exhibit # 31).
29. On August 5, 2014, at 10:15 AM, I called Mr. Davids.
30. I got his, Mr. Davids, cell phone answering machine. I left a message on his phone asking him to contact me about the loan information that I had sent to him yesterday.
31. As of the date of this filing, I have not received any type of response from Mr. Davids about this loan proposal or any of my loan requests.

**Continued Argument: Against Bank of America:**

- A. Why have I been denied my legal right to apply for a business loan from the Bank of America?
- B. What makes me different from the other business owners that the Bank of America has granted this legal right to?
- C. According to the SBA Philadelphia District Loan Volume Report Fiscal Year 2013 (10/1/2012 to 9/30/2013), the Bank of America made 3 small business loans totaling \$779,000.00, with the average loan being \$259,667.00.
  - a. The average loan issued by the Bank of America was not significantly far from my loan requests! Why did the Bank of America extended this legal right of borrowing to them, these three businesses, and not me?
  - b. All three of these loans were guaranteed by the SBA. **They enjoyed the benefits of this federal law!**
  - c. What other type of collateral was offered for security, for these loans, by these businesses?
  - d. What makes me different from them? Did they contact the Bank of America in a different way than I did?

- e. Do they all have \$250,000.00 in annual sales?
- f. What type of businesses are these?
- g. How many loans have these businesses received from this bank in the past?
- h. And if so then, what were the financial conditions of these businesses at the time of those loans?
- i. How many of them are veteran own businesses?
- j. How many employees do these businesses have?

1. Mr. Davids asked me, during the last time he talked to me on his phone, how many employees I had.

- k. How many of these loans are Patriot Loans?
- l. What is the repayment status of each one of these loans?

D. According to the SBA Philadelphia District Loan Volume Report Fiscal Year 2014 (10/1/2013 to 6/30/2014), so far this year, the Bank of America has made another 3 small business loans totaling \$215,000.00, with the average loan being \$71,667.00.

- a. Here the Bank of America has granted this legal right of borrowing to another 3 businesses, with their loan services.

**b. Another three businesses benefitting from federal law**

- c. How many of these loans were made under the Patriot Loan program?
- d. What type of businesses are these?
- e. How many loans have these businesses received in the past from this bank?
- f. And if so then, what was the financial condition of those businesses at the time of their loans?
- g. Do they all have annual sales of at least \$250,000.00
- h. How many employees does each business have?
- i. How many of them are veteran own businesses?
- j. What is the repayment status of each one of these loans?

- E. That is a total of six different businesses that this bank has granted their legal right of a loan, from the Bank of America loan department, during the same time period that I have been seeking a loan.
- a. What is so inherently different between my businesses and these six businesses that this bank has refused to allow me to even apply for a business loan, which is my legal right?
  - b. Another way of looking at this question is, what do all of these, (these six), businesses have in common that I, my businesses, do not have? Do they have rights different from me?
- F. How many other businesses have applied for business loans but were denied by the Bank of America?
- a. If there is this group, why were they denied?
  - b. Am I similar to this group, if it does exist, that has been denied loans, and if so how am I similar?

**Argument: Against Wells Fargo Bank:**

I contacted Wells Fargo Bank seeking a business loan. I was seeking this loan under the Small Business Administration Guarantee Loan Program, a federal agency established, by federal law, to assist small businesses such as mine. I also informed the Bank that I was a veteran, and that there was an additional federal law that would benefit me in my application for a loan. This Bank has refused to honor my right to the benefits of federal laws that would improve the life of my family, my community and myself.

The following narrative narrates my interaction with the Wells Fargo Bank, to show that I have repeatedly attempted to exercise this legal right:

1. On December 5, 2012, I went to Wells Fargo's branch office located 2843 N. Broad Street, in Philadelphia, seeking a business loan. I talked to one of the employees there. After taking my information, about how much I wanted to borrow and what it was to be used for, this employee told me that they do not handle business loans at that branch. But, she said that I have sent your information, by computer, because she was typing as we were talking, to our department that handles small business loans. She said that someone would be contacting you within 24 to 48 hours.

2. She also mentioned that the bank only make loans to businesses that have sales volume of at least \$250,000.00 in annual sales. I told her that I did not have that amount in annual sales. I told her that I wanted the loan so that I could increase my level of sales/business. Nevertheless, she forwarded my information to the bank's small loan department.
3. I never received any type of response from their small business department. I therefore tried again, in August of 2013.
4. In middle or late August 2013, I went to the Wells Fargo's branch office located at 1500 Market Street, in Philadelphia. I met with a Mr. Walker Dugan, a Personal Banker, at this branch office. I told him what I was looking for. He said that he would take my information and contact their small business loan department. He said he would be getting back to me.
5. After about a week, I had not heard anything from Mr. Dugan. After finally getting in touch with Mr. Dugan, he explained to me that he had been out for awhile and that is why he had not contacted me up to that point.
6. On September 4, 2013, Mr. Dugan arranged a three-way call between himself, Mr. Brendan McMoran, Business Development Officer, for Wells Fargo, and me. I explained to Mr. McMoran what I was looking for and what I wanted to do with the business loan. He said, Mr. McMoran, that sounded fine and that he would e-mail me a list of information needed from me and once he received it back we can go from there.
7. On September 4, 2013, I received an e-mail from Mr. McMoran, (see Exhibit # 32).
8. On September 9, 2013, I e-mailed all the information back to Mr. McMoran that he had requested and I also sent a copy of this e-mail to Mr. Dugan, (see Exhibit # 33).
9. By September 28, 2013, I had not heard anymore from Mr. McMoran and I thought that this stockbroker, that I was in contact with, was going to assist me in raising the capital that I needed, so I e-mailed Mr. McMoran the following e-mail and I also sent a copy of this e-mail to Mr. Dugan, (see Exhibit # 34).
10. I did not receive any kind of response back from either Mr. McMoran or Mr. Dugan.
11. I do not remember who initiated the call but, I strongly doubt that it was Mr. McMoran or Mr. Dugan. Nevertheless we, Mr. McMoran and I, talked on November 4, 2013 because I sent him the following e-mail and I sent a copy of this e-mail to Mr. Dugan, (see Exhibit # 35).
12. I did not receive any kind of response back from Mr. McMoran or Mr. Dugan.
13. On December 9, 2013, I sent Mr. McMoran an e-mail requesting a smaller loan and I included with my request a notation about my initial loan request and I also sent a copy of this e-mail to Mr. Dugan, (see Exhibit # 36).

14. I did not receive any kind of response from Mr. McMoran or Mr. Dugan.
15. On August 6, 2014, I sent Mr. McMoran an e-mail requesting information that I would need to apply for a business loan and I also sent a copy of this e-mail to Mr. Dugan, (see Exhibit # 37).
16. As of the date of the filing of this Complaint, my initial loan request, my second loan request and my request for information to apply for another loan have all gone unanswered.

**Continued Argument: Against Wells Fargo Bank:**

- A. How am I different from the other business owners that Wells Fargo Bank has granted this legal right of business loans to?
- B. According to the SBA Philadelphia District Loan Volume Report Fiscal Year 2013 (10/1/2012 to 9/30/2013), Wells Fargo Bank made 80 small business loans totalling \$36,667,300.00, with the average loan being \$458,341.00.
  - a. The average loan issued by Wells Fargo was in the range of my initial loan request! Why did Wells Fargo Bank grant them their legal right to a loan, these 80 businesses, and not me?
  - b. These 80 loans were all guaranteed by the SBA.
  - c. **All eighty of them are benefitting from federal Law!**
  - d. What other collateral was offered by these businesses to secure their loan?
  - e. How many loans have these businesses received from this bank in the past?
  - f. If so then, what was the financial condition of those businesses at the time that they received those loans?
  - g. What makes me different from them? Did they contact Wells Fargo Bank in a different way?
  - h. Do they all have \$250,000.00 in annual sales?
  - i. How many of them are veterans own businesses?

- j. How many of these loans are Patriot Loan?
  - k. What is the repayment status of each one of these loans?
  - l. How many other businesses applied for small business loans but were denied by Wells Fargo?
  - m. If this group does exist, why were they denied loans from Well Fargo?
  - n. Am I like this group, If it does exist, that were denied a small business loan and If so how?
- C. According to the SBA Philadelphia District Loan Volume Report Fiscal Year 2014 (10/1/2013 to 6/30/2014), so far this year, Wells Fargo Bank has made another 54 small business loans totalling \$18,256,600.00, with the average loan being \$338,085.00.
- a. Here Wells Fargo Bank has granted this legal right to a business loan to another 54 businesses, with their business loan services.
  - b. That is a total of 134 different businesses that have been granted their legal right of a business loan by Wells Fargo loan department, during the same time period that I have been seeking a business loan.
  - c. What is so inherently different between my businesses and these 134 businesses that this bank has refused to allow me to even apply for a business loan?
  - d. Another way of looking at this question is, what do all of these, (these 134), businesses have in common that I, my businesses, do not have?
- D. In reference to the e-mail that I sent to Mr. McMoran and Mr. Dugan about how his (Mr. McMoran) information was very informative and helpful. The information that I received from Mr. McMoran was "misinformation". This misinformation worked for awhile but it did not and could not stand up to the test of time. I believe that I was given that misinformation at that time to distract and deter me from pursuing my loan request. The proof or disproof of this position can be found in the answer to the following question.
- a. How many of these 134 businesses, that Wells Fargo granted loans to, had sufficient working capital to service their loans irrespective of the loan proceeds that they received?
- E. That misinformation was also behind the statement that I made in the e-mail that I sent to Mr. McMoran and Mr. Dugan in Exhibit # 34 about my "fully understanding....".

- F. At the time of filing of this Complaint, my initial business loan request, my second request for a smaller business loan and my last request for information so that I could apply for a business loan from Wells Fargo Bank have not been granted by this bank.

**Combined Argument Against Bank of America and Wells Fargo Bank:**

My federal government has promised, by federal law, that if I met their criteria for a business that they would guarantee a business loan, for said business. This promise is a right that the federal government has extended to all citizens in America. These loans can only be made by banks that the SBA has approved for issuing such loans. That is why I contacted the Bank of America and Wells Fargo Bank. They both have been approved to issue loans to business, with government guarantees. **The federal government and Pennsylvania law has trusted them to do the right thing, by abiding by all their laws.**

But yet, these banks have denied me this legal right. Why? I have federal identification numbers for both corporations. I have DUNS numbers for both. I have legally incorporated both corporations in the State of Pennsylvania and I have business licenses for both from the City of Philadelphia. I have tax records and I have financial statements. I am a natural United States citizen. I have business plans and I have business projections. I have everything a business owner is supposed to have by federal, state and local laws, in order to operate a business. So, why has these banks denied me my legal right to a loan?

Both of these banks have issued a combined total of 140 SBA guaranteed small business loans. Why were these other businesses granted this legal right and not me? Is there some policy somewhere that I have overlooked that has caused this denial? I doubt it! The policy of the SBA is clear and unmistakable. The federal laws that the SBA uses are clear and unmistakable. The banks own policies on their own web sites, in regard to these federal laws, are clear and unmistakable. They all state the clarity of federal laws, in regards to loan assistances for small businesses.

Nevertheless I have been denied the right to enter into a contract of a business loans by these banks. Why? This is a legal right that is guaranteed to me by federal law. I cannot be denied this legal right, but yet I have by these SBA approved banks. There has to be a reason for this denial of my legal rights by these banks. There has to be some explanation for their actions.

The only valid explanation has to be a type of discrimination by these banks. What this discrimination is based on has to be established in court. But, any type of discrimination is illegal according to federal and state laws.

Because of this lack of action, the denial of my legal rights to a business loan, by these banks, I have missed out on a number of business opportunities that a business loan would have secured for me. Those lost opportunities have injured the growth and development of my business and in turn have injured the growth and development of my family, my community and myself.



### INJURY

The lost opportunities that I am referring to, which has injured the development of my businesses, are listed below according to the business plans, that I was working on at the time, that each bank was contacted for financial assistance, in the form of a business loan:

#### The Bank of America:

1. The property that I was seeking to purchase, with my original loan request, has now become infeasible for my business development. Part of the property has recently been sold to a developer and the remaining parcel is too constricted for my businesses development.
2. By not having a physical business location, other than my home, this has also hindered my ability to control and expand my publishing capabilities. I needed that property to house the publishing equipment, which I was looking to purchase, and support services for publishing, like office space for writers, staff, etc.
3. This hindrance, of not having a business loan, is also preventing me from the possibility of being able to acquire the 20 acres of land, in Delaware, which is still available, for my Project Seedling. Project Seedling is the building and operation of my own low power FM radio station.
4. This denial of a business loan has hindered my ability to even have the opportunity to expand my businesses.

#### Wells Fargo Bank:

1. The property that I was seeking to purchase, with my original loan request, was recently sold. The new owners are not interested in selling this property, again. They only want to lease it.
2. I was given the opportunity to purchase this building right-out by the realtor handling the sale. That is why I went to this bank! The bank's denial of service caused me to lose this property.

3. By not have a physical business location, other than my home, this has also hindered my ability to control and expand my publishing capabilities. I needed that property to house the publishing equipment, which I was looking to purchase, and support services for publishing, like office space for writers, staff, etc.
4. This denial of a business loan has hindered by ability to even have the opportunity to expand my businesses.

#### **RELIEF SOUGHT**

If after trial, and the court finds in favor of me, the plaintiff, I request the following relief be granted to me from the defendants by this court:

#### **COMPENSATORY DAMAGES**

I ask this court to award me monetary compensation of:

- \$259,000.00 from the Bank of America that was the asking price of the property (1724 W. Indiana Ave, Philadelphia, Pa.) I sought a loan for, which has now been render infeasible for my business development needs.
- \$49,900.00 for the 20 acres of land in Delaware, if it is no longer available at the conclusion of this trial from the Bank of America.
- \$350,000.00 from Wells Fargo Bank that was the sale price of the sold property (520 W. Roosevelt Blvd., Philadelphia, Pa.) that I sought a loan for.
- That both of these banks, Bank of America and Wells Fargo Bank, allow me to apply for a business loan from both of them.

**PUNITIVE DAMAGES**

I ask this court to award me monetary compensation of \$10,000,000.00 from each of the defendants in punitive damages, for their discriminatory practices.

I also ask that this court to forward a copy of this lawsuit, with its findings, to the Federal Justice Department Civil Rights Division and the Pennsylvania Human Relations Commission to make them aware of the findings of this court.

I declare under the penalty of perjury that the foregoing statements in this Complaint are true and correct.

Date: February 1, 2015

Waliyuddin S. Abdullah

Waliyuddin S. Abdullah

## CERTIFICATION OF SERVICE

I, the plaintiff, Waliyyuddin S. Abdullah, in the above action, do hereby depose and say that within 5 days of the filing of this Civil Action, a true and correct copy of this Civil Action will be served on the Defendants by First Class mail at the following addresses:

- Bank of America  
C/o Branch Manager  
932 Chestnut Street  
Philadelphia, Pa. 19107
- Wells Fargo  
C/o Branch Manager  
2240 Butler Pike  
Plymouth Meeting, Pa. 19462

Waliyyuddin S. Abdullah

Waliyyuddin S. Abdullah

Mr. Waliyyuddin S. Abdullah  
2451 N. 19<sup>th</sup> Street  
Philadelphia, Pa. 19132-4304

WALIYYUDDIN S. ABDULLAH

PLAINTIFF

IN THE COURT OF COMMON PLEAS

TRIAL DIVISION

V.

BANK OF AMERICA & WELLS FARGO BANK

DEFENDANTS

TERM:

No.

**VERIFICATION**

I, Waliyyuddin S. Abdullah, verify that I am the plaintiff in the present action and that the facts and statements contained in the above Complaint are true and correct to the best of my knowledge, information and/or belief. I understand that false statements are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Date: February 1, 2015

W. L. S. Abdullah

Waliyyuddin S. Abdullah

Mr. Waliyyuddin S. Abdullah  
2451 N. 19<sup>th</sup> Street  
Philadelphia, Pa. 19132-4304

WALIYYUDDIN S. ABDULLAH

PLAINTIFF

IN THE COURT OF COMMON PLEAS

TRIAL DIVISION

V.

BANK OF AMERICA & WELLS FARGO BANK

DEFENDANTS

TERM:

No.

**ORDER**

**AND NOW**, to wit, this \_\_\_\_\_ day of \_\_\_\_\_ 2015, after trial and verdict in favor of the Plaintiff, it is hereby **ORDERED AND DECREED** that the Defendants: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**BY THE COURT**

\_\_\_\_\_

J.

# Exhibits

Page 1 of 2



Print

Subject Bank of America Loan Information  
From: Davids, Justin <justin.davids@bankofamerica.com>  
Sent: Dec 6, 2012 10:35:35 AM  
To: Islamiccomm.network@verizon.net

Thank you for your time today. As we discussed, in order to apply for the line of credit, please complete the personal financial statement (attached), sign & date. Please note that we will pull personal and business credit during the application process.

We will ask you to please provide the following financials for all owners:

2010 personal and business tax returns (all pages)

2011 personal and business tax returns (all pages)

Completed Personal financial statement (attached)

Completed business debt schedule (attached)

Balance Sheet

Income statement

If you are a Sole Proprietorship, please provide a Business License or Filing of Fictitious Registration (or certificate).

Can you send these to me through Email as a PDF or we make arrangements to meet and collect.

Thanks again,

Justin Davids

Exhibit # 1

<http://netmail.verizon.net/webmail/driver?nimlet=degetemail&fn=INBOX&page=3&deg...> 3/28/2013



Page 2 of 2

Vice President | Small Business Banking

Bank of America | Global Consumer & Small Business Banking

Philadelphia Metro Market

Mailstop: PA7-238-01-01

Cell: 267.644.6632 | E-Fax: 646.822.1057

[Justin.Davies@bankofamerica.com](mailto:Justin.Davies@bankofamerica.com)

This message, and any attachments, is for the intended recipient(s) only, may contain information that is privileged, confidential and/or proprietary and subject to important terms and conditions available at <http://www.bankofamerica.com/emaildisclaimer>. If you are not the intended recipient, please delete this message.

Exhibit # 2

<http://netmail.verizon.net/webmail/driver?nmler=deggetemail&fn=INBOX&page=5&deg...> 3/28/2013

Bank of America

## Personal Financial Statement

## PERSONAL PROFILE

You may apply for credit in your name alone, regardless of marital status. Check your marital status below only if (a) you live in a community property state, such as California, or (b) this is a joint application. You must answer the questions about your spouse only if you're married and (a) you live in a community property state, or (b) this is a joint application with your spouse. If you're married and live in a community property state, Bank of America, N.A., will assume that all assets, income, and debts are community property, unless you indicate otherwise.

Check one of the following: ☐ Married ☐ Unmarried ☐ Separated

NAME	DATE OF BIRTH	SOCIAL SECURITY NO.
STREET ADDRESS	CITY	STATE ZIP
HOW LONG AT ADDRESS	<input type="checkbox"/> OWN <input type="checkbox"/> RENT <input type="checkbox"/> OTHER	HOME PHONE
EMPLOYED BY	HOW LONG	OCCUPATION
EMPLOYER ADDRESS	CITY	STATE ZIP
SPOUSE'S NAME	DATE OF BIRTH	SOCIAL SECURITY NO.
EMPLOYED BY	HOW LONG	OCCUPATION
EMPLOYER ADDRESS	CITY	STATE ZIP

TOTAL NUMBER OF DEPENDENTS	AGES OF DEPENDENTS
Financial Information as of (Month), (Day), (Year)	
ASSETS (List and describe all assets)	LIABILITIES (List and describe all liabilities)
CHECKING NAME OF FINANCIAL INSTITUTION	Real Estate Loans (Schedule C on reverse)
SAVINGS NAME OF FINANCIAL INSTITUTION	Monthly Rent Payment
ACCOUNTS/NOTES RECEIVABLE (Please itemize)	OTHER OBLIGATIONS (Please itemize)
Marketable Securities (from Schedule A on reverse)	
Businesses Owned (from Schedule B on reverse)	
Real Estate (from Schedule C on reverse)	
Retirement Accounts (Vested Interest)	
OTHER ASSETS (Please itemize)	
TOTAL ASSETS \$	TOTAL LIABILITIES/PAYMENTS \$
	NET WORTH (Total Assets MINUS Total Liabilities) \$
	TOTAL (Total Liabilities PLUS Net Worth) \$

ANNUAL INCOME	ANNUAL EXPENDITURES
Income Sources - Income from alimony, child support or separate maintenance does not have to be stated unless you want it considered.	Rent/Lease payment(s)
Your Gross Annual Salary	Income Taxes
Your Spouse's Gross Annual Salary	Insurance Premiums (all types)
Gross Annual Rental Income	Property Taxes
OTHER INCOME (Please itemize)	Alimony, Child Support or Separate Maintenance
	Other (include installment payments other than real estate)
	1.
	2.
TOTAL \$	TOTAL EXPENDITURES \$
Is any of this income likely to be reduced or interrupted within the next year?	Do you have loans/obligations in any other individual or business name?
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, how long will the interruption last? Describe:	<input type="checkbox"/> Yes, describe <input type="checkbox"/> No
	1.
	2.
	TOTAL \$

09-00-1000000 00-0005

Please complete reverse side

Exhibit # 3

\* OWNERSHIP TYPE: JT - Joint Tenancy TC - Tenants in Common  
CP - Community Property SP - Separate Property

**SCHEDULE A** Marketable Securities (Attach Supplemental Schedule if necessary)

NO. OF SHARES AMT. OF BONDS	DESCRIPTION	EXCHANGE LISTED	NAME(S) OF OWNER(S)	*OWNERSHIP TYPE	CURRENT MARKET OR LISTED OR ESTIMATED VALUE ON UNLISTED

**SCHEDULE B** Business (Attach Supplemental Schedule if necessary)

NO. OF SHARES	DESCRIPTION	NAME(S) OF OWNER(S)	*OWNERSHIP TYPE	PERCENTAGE OWNERSHIP	CURRENT VALUE

**SCHEDULE C** Real Estate (Attach Supplemental Schedule if necessary)

PROPERTY ADDRESS AND TYPE OF IMPROVEMENT	PURCHASE DATE	NAME(S) OF OWNER(S)	*OWNERSHIP TYPE	NET ANNUAL RENTAL INCOME	ESTIMATED VALUE	AMOUNT OWING	TO WHOM PAYABLE /MONTHLY PAYMENT

**GENERAL INFORMATION ON APPLICANT AND SPOUSE** (Provide full details on any "yes" answers in questions 2-8, attach separate sheet if necessary)

- Are your principal cash deposits held jointly with another person? ☐ Yes ☐ No If yes, with whom? \_\_\_\_\_
- Are any assets encumbered or debts secured except as indicated? ☐ Yes ☐ No
- Are there any suits or unpaid judgments now pending against you? ☐ Yes ☐ No
- Have you ever voluntarily surrendered or had a vehicle, or any other item repossessed? ☐ Yes ☐ No
- Have you or your spouse ever been the subject of bankruptcy proceedings? ☐ Yes ☐ No
- Have you ever applied for or obtained credit under another name? ☐ Yes ☐ No
- Are you a U.S. Citizen? ☐ Yes ☐ No If no, please give country of citizenship and visa status: \_\_\_\_\_
- Are any assets held in a trust? ☐ Yes ☐ No

Life Insurance B	Name of Insured	Name of Company
Beneficiary's Name	Address	Relationship
Life Insurance C	Name of Insured	Name of Company
Beneficiary's Name	Address	Relationship

**YOUR SIGNATURE**

By signing below, you certify that the statements above and on any attachments are true and complete as of the date given below. You authorize the Bank to verify or check any of the information given, check your credit references, verify employment and obtain credit reports. You also authorize the Bank to provide credit information about you and your accounts to others.

DATE 1/1 X  
APPLICANT

DATE 1/1 X  
APPLICANT

**Exhibit # 4**

Bank of America



## Schedule of Business Debt

Business name

Federal tax ID number

(Complete legal name and DBA name, if applicable, as shown on the application.)

Please use this form to list, in detail, your business indebtedness. This listing should include, but not be limited to, lines of credit, term (installment) loans and letters of credit. Indicate by asterisk (\*) items to be paid by loan proceeds and the reason for payoff. Present balances should agree with latest balance sheet. Please fill out this form as completely as possible.

## Schedule of business debt

Financial institution Name and address	Original date	Original amount	Present balance	Interest rate	Maturity date	Monthly payment	Collateral provided
	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	
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	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	
	/ /	\$	\$		/ /	\$	

I certify that the foregoing information is true, complete and correct.

Authorized signature

Name of borrower

Prepared by (print name)

Signature X

Date / /

Bank of America, N.A.  
© 2000 Bank of America Corporation  
08-14-48993W 08-2000 (GA)

1 of 1

Exhibit #5

3/28/15

Outlook Print Message

## Loan Proposal

From: Waliyyuddin Abdulla (waliyyuddin@hotmail.com)

Sent: Fri 12/28/12 3:14 PM

To: justin.davids@bankofamerica.com

1 attachment

Loan Proposal.pdf (5.2 MB)

Mr. Davids:

I am having trouble accessing my business e-mail account. I therefore am sending you my loan request by my personal e-mail site. I have attached all the information that you have requested to this e-mail.

# Exhibit # 6

### Loan Proposal

To: Justin Davids

From: Waiyyuddin S. Abdullah

Owner - Islamic Communication Network, Inc.

Subject: Business loan of \$500,000.00

I am applying to the Bank of America for a loan of \$500,000.00, under the Patriot Express Loan Initiative. A portion of this loan will be use to purchase a commercial property, here in the City of Philadelphia. Another portion of this loan will be use to renovated this commercial property, that will then house the different business entities of the Islamic Communication Network, Inc. The last portion of this loan will be use to purchase equipment for the business and have some operational capital.

I have included the following information that you requested in this loan proposal:

- Personal and Business Taxes for 2010 & 2011
- Bank's - Financial Statement
- Bank's - Business Debt Schedule
- Islamic Communication Network, Inc. - Balance Sheet
- Islamic Communication Network, Inc. - Income Statement

1  
Exhibit # 7

## Islamic Communication Network, Inc.

## Balance Sheet

## Assets:

Cash on hand .....	\$1,600.00
Copy Right Materials.....	\$150,000.00
• Books, Magazine and Radio Programs	
Data Listing.....	\$75,000.00
• Listing of Muslims households in PA, NJ, DE & MD	
• Listing of Muslims businesses in the same states	
• Listing of Muslims houses of worship in the same states	

Total Assets.....\$226,600.00

## Liabilities:

No long term liabilities &amp; no long term accounts payable.....\$0.00

Total Liabilities.....\$0.00

Balance.....\$226,600.00

Prepared by:

Wahyuddin S. Abdullah

CEO/President

December 10, 2012

Exhibit # 8

## Islamic Communication Network, Inc.

## Income Statement

January 2012 - November 2012

## Income:

General Contracting Work	\$21,000.00
Usage of Data Records	\$10,000.00
Rights To Published Materials	\$17,000.00

Total Revenue: \$48,000.00

## Expenses:

Compensation	\$29,000.00
Workers	\$5,800.00
Phone & Internet	\$1,475.00
Postage	\$395.00
Misc. Expenses	\$1,389.00
Transportation	\$475.00
Studio Rental	\$4,200.00
Charity	\$1,350.00
Advertising	\$2,516.00

Total Expenses \$46,400

Net Income: \$1,600.00

Prepared by:

Wailyyiddin S. Abdallah

CEO/President, December 17, 2012

Exhibit # 9



Bank of America

## Personal Financial Statement

## PERSONAL PROFILE

You may apply for credit in your state alone, regardless of marital status. Check your marital status below only if (a) you live in a community property state, such as California, or (b) this is a joint application. You must answer the questions about your spouse only if you're married and (a) you live in a community property state, or (b) this is a joint application with your spouse.

If you're married and live in a community property state, Bank of America, N.A., will assume that all assets, income, and debts are community property, unless you indicate otherwise.

Check one of the following: ☒ Married ☐ Unmarried ☐ Separated

NAME Walyyuddin S. Abdullah		DATE OF BIRTH 3/25/1974	SOCIAL SECURITY NO. 192-44-4450
STREET ADDRESS 2451 N. 19 <sup>th</sup> Street		CITY Philadelphia	STATE ZIP Pa -191324304
HOW LONG AT ADDRESS 23 Years 11 Mos. <input checked="" type="checkbox"/> OWN <input type="checkbox"/> RENT <input type="checkbox"/> OTHER		HOME PHONE 215.223.3549	
EMPLOYED BY Islamic Communication Network, Inc.		HOW LONG 26 Yrs. 3 Mos. OCCUPATION Owner	BUSINESS PHONE 215.227.640
EMPLOYER ADDRESS 2451 N. 19 <sup>th</sup> Street		CITY Philadelphia	STATE ZIP Pa -191324304
SPOUSE'S NAME Zakia Abdullah		DATE OF BIRTH 3/18/1969	SOCIAL SECURITY NO. 181-88-1983
EMPLOYED BY		HOW LONG Yrs. Mos. OCCUPATION Student	BUSINESS PHONE
EMPLOYER ADDRESS		CITY	STATE ZIP

TOTAL NUMBER OF DEPENDENTS 4	AGES OF DEPENDENTS 14, 13, 10, 1
---------------------------------	-------------------------------------

Financial Information as of 12 (Month), 21 (Day), 2012 (Year).

ASSETS (List and describe all assets)	MARKET VALUE	LIABILITIES (List creditor names)	BALANCE OWING	MONTHLY PAYMENT
CHECKING NAME OF FINANCIAL INSTITUTION		List credit cards, open lines of credit, and other liabilities (including alimony and child support). Also list loans with assets used as security.		
Bank of America	\$ 136.00	CREDIT CARDS/LINES OF CREDIT (Please Number)	\$ 0	\$ 0
Wells Fargo (Islamic Comm. Acct.)	1,600.00			
SAVINGS NAME OF FINANCIAL INSTITUTION				
Bank of America	50.00			
ACCOUNTS/NOTES RECEIVABLE (Please Number)	0			
		Real Estate Loans (Schedule C on reverse)	0	0
Marketable Securities (from Schedule A on reverse)	0	Monthly Rent Payment	0	0
Buyerless Owned (from Schedule B on reverse)	224,000.00	OTHER OBLIGATIONS (Please Number)		
Real Estate (from Schedule C on reverse)	30,000.00	Personal Mortgage Obligation	20,000.00	0
Retirement Accounts (Vested Interest)	0			
OTHER ASSETS (Please Number)				
		<b>TOTAL LIABILITIES/PAYMENTS</b>	<b>20,000.00</b>	<b>0</b>
		<b>NET WORTH</b>		
		(Total Assets MINUS Total Liabilities)	<b>\$ 236,786.00</b>	
		<b>TOTAL</b>		
		(Total Liabilities PLUS Net Worth)	<b>\$ 236,786.00</b>	
<b>TOTAL ASSETS</b>	<b>\$ 256,786.00</b>			

ANNUAL INCOME		ANNUAL EXPENDITURES	
Income Sources - Income from alimony, child support or separate maintenance does not have to be stated unless you want it considered.		Real Estate payment(s)	
Your Gross Annual Salary	\$ 27,000	Rent/Lease payment(s)	\$ 0
Your Spouse's Gross Annual Salary	\$	Income Taxes	\$ 0
Gross Annual Rental Income	\$	Insurance Premiums (all types)	\$ 480.00
OTHER INCOME (Please Number)	\$	Property Taxes	\$ 45.00
Pension	\$ 7,500	Alimony, Child Support or Separate Maintenance	\$ 0
	\$	Other (Include installment payments other than real estate)	\$
	\$	1. Utilities	\$ 3,500
	\$	2.	\$
<b>TOTAL</b>	<b>\$ 34,500</b>	<b>TOTAL EXPENDITURES</b>	<b>\$ 4,025</b>
Is any of this income likely to be reduced or interrupted within the next year?		Do you have installment obligations to any other individual or business name?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how long will the interruption last? Describe:		<input type="checkbox"/> Yes, describe <input checked="" type="checkbox"/> No	
		1.	
		2.	
		<b>TOTAL \$</b>	

06-164291ENSAW 06-2008

Please complete reverse side

Exhibit # 10

\* OWNERSHIP TYPE: JT = Joint Tenancy TC = Tenants in Common  
CP = Community Property SP = Separate Property

**SCHEDULE A — Marketable Securities (Attach Supplemental Schedule if necessary)**

NO. OF SHARES AMT. OF BONDS	DESCRIPTION	EXCHANGE LISTED	NAMES OF OWNER(S)	*OWNERSHIP TYPE	CURRENT MARKET OR LISTED OR ESTIMATED VALUE ON INLISTED

**SCHEDULE B — Businesses (Attach Supplemental Schedule if necessary)**

NO. OF SHARES	DESCRIPTION	NAMES OF OWNER(S)	*OWNERSHIP TYPE	PERCENTAGE OWNERSHIP	CURRENT VALUE

**SCHEDULE C — Real Estate (Attach Supplemental Schedule if necessary)**

PROPERTY ADDRESS AND TYPE OF IMPROVEMENT	PURCHASE DATE	NAMES OF OWNER(S)	*OWNERSHIP TYPE	NET ANNUAL RENTAL INCOME	ESTIMATED VALUE	AMOUNT OWING	TO WHOM PAYABLE /MONTHLY PAYMENT

**GENERAL INFORMATION ON APPLICANT AND SPOUSE (Provide full details on any "yes" answers to questions 2-6. Attach separate sheet if necessary.)**

- Are your principal cash deposits held jointly with another person? ☒ Yes ☐ No If yes, with whom? My wife
- Are any assets encumbered or debts secured except as indicated? ☐ Yes ☒ No
- Are there any suits or unpaid judgments now pending against you? ☐ Yes ☒ No
- Have you ever voluntarily surrendered or had a vehicle, or any other item repossessed? ☐ Yes ☒ No
- Have you or your spouse ever been the subject of bankruptcy proceedings? ☐ Yes ☒ No
- Have you ever applied for or obtained credit under another name? ☐ Yes ☒ No
- Are you a U.S. Citizen? ☒ Yes ☐ No If no, please give country of citizenship and visa status: \_\_\_\_\_
- Are any assets held in a trust? ☐ Yes ☒ No

Life Insurance \$ 10,000	Name of Insured Wallyyuddin S. Abdullah	Name of Company Globe Life
Beneficiary's Name Zabin Abdullah	Address 2451 N. 19 <sup>th</sup> Street, Philadelphia, Pa. 19132-4304	Relationship Wife
Life Insurance \$	Name of Insured	Name of Company
Beneficiary's Name	Address	Relationship

**YOUR SIGNATURE**

By signing below, you certify that the statements above and on any attachment(s) are true and complete as of the date given below. You authorize the Bank to verify or check any of the information given, check your credit references, verify employment and obtain credit reports. You also authorize the Bank to provide credit information about you and your accounts to others.

DATE 21/21/2012

APPLICANT

DATE

APPLICANT

**Exhibit # 11**



### Schedule of Business Debt

Federal tax ID number 23-2408419

Please use this form to list, in detail, your business indebtedness. This listing should include, but not be limited to, lines of credit, term (installment) loans and letters of credit. Indicate by asterisk (\*) items to be paid by loan proceeds and the reason for payoff. Present balance should agree with latest balance sheet. Please fill out this form as completely as possible.

Financial institution Name and address	Original date	Original amount	Present balance	Interest rate	Monthly date	Monthly payment	Collateral pledged
---	------------------	--------------------	--------------------	------------------	-----------------	--------------------	-----------------------

[illegible]

Authorized signature

W. G. L. S. Hall

Date 12/21/2012

1 of 1

# Exhibit # 12

Form 1040A Department of the Treasury—Internal Revenue Service U.S. Individual Income Tax Return (a) 2010 (PS Use Only—Do not write or staple in this space.)

**Name, Address, and SSN**

Your first name and initial: Wallyuddin S. Last name: Abdullah

If a joint return, spouse's first name and initial: Zaida Last name: Abdullah

Home address (number and street). If you have a P.O. box, see instructions. Apt. no.: 2451 N. 58th Street

City, town or post office, state, and ZIP code. If you have a foreign address, see instructions: Philadelphia, Pa. 19132-4304

PS Use Only: Make sure the SSN(s) above are correct. Checking a box below will not change your tax or refund.

**Filing status** Check only one box.

1 ☐ Single 4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter the child's name here.

2 ☒ Married filing jointly (even if only one had income) 5 ☐ Qualifying widow(er) with dependent child (see instructions)

3 ☐ Married filing separately. Enter spouse's SSN above and full name here.

**Exemptions**

5a ☒ Yourself. If someone can claim you as a dependent, do not check box 5a.

b ☒ Spouse

c Dependents:

(1) First name	Last name	(2) Dependent's social security number	(3) Dependent's relationship to you	(4) <input checked="" type="checkbox"/> If child under age 17 qualifying for child tax credit (see page 10)

More than six dependents, see instructions.

d Total number of exemptions claimed: 2

**Income**

7 Wages, salaries, tips, etc. Attach Form(s) W-2. 7 25,000 00

8a Taxable interest. Attach Schedule B if required. 8a 0

8b Tax-exempt interest. Do not include on line 8a. 8b 0

9a Ordinary dividends. Attach Schedule B if required. 9a 0

9b Qualified dividends (see instructions). 9b 0

10 Capital gain distributions (see instructions). 10 0

11a IRA distributions. 11a 11b Taxable amount (see instructions). 11b 0

12a Pensions and annuities. 12a 7,581 12b Taxable amount (see instructions). 12b 7,581 00

13 Unemployment compensation and Alaska Permanent Fund dividends. 13 0

14a Social security benefits. 14a 14b Taxable amount (see instructions). 14b 0

15 Add lines 7 through 14b (far right column). This is your total income. 15 32,581 00

**Adjusted gross income**

16 Educator expenses (see instructions). 16 0

17 IRA deduction (see instructions). 17 0

18 Student loan interest deduction (see instructions). 18 0

19 Tuition and fees. Attach Form 8917. 19 0

20 Add lines 16 through 19. These are your total adjustments. 20 0

21 Subtract line 20 from line 15. This is your adjusted gross income. 21 32,581 00

For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see separate instructions. Cat. No. 11327A Form 1040A (2010)

Exhibit # 13

Form 1040A (2010) Page 2

**Tax, credits, and payments**

22 Enter the amount from line 21 (adjusted gross income). 22 35,881 00

23a Check ☐ You were born before January 2, 1948, ☐ Blind ☐ Total boxes if: ☐ Spouse was born before January 2, 1948, ☐ Blind checked ☐ 23a

b If you are married filing separately and your spouse itemizes deductions, see page 60 and check here ☐ 23b

24 Enter your standard deduction (see instructions). 24 11,400 00

25 Subtract line 24 from line 22. If line 24 is more than line 22, enter -0-. 25 24,481 00

26 Exemptions. Multiply \$3,600 by the number on line 6d. 26 7,300 00

27 Subtract line 26 from line 25. If line 26 is more than line 25, enter -0-. 27 13,981 00

This is your taxable income. 27 13,981 00

28 Tax, including any alternative minimum tax (see instructions). 28 1,368 00

29 Credit for child and dependent care expenses. Attach Form 2441. 29 0

30 Credit for the elderly or the disabled. Attach Schedule R. 30 0

31 Education credits from Form 8863, line 23. 31 0

32 Retirement savings contributions credit. Attach Form 8880. 32 0

33 Child tax credit (see instructions). 33 0

34 Add lines 29 through 33. These are your total credits. 34 0

35 Subtract line 34 from line 28. If line 34 is more than line 28, enter -0-. 35 1,368 00

36 Advance earned income credit payments from Form(s) W-2, box 9. 36 0

37 Add lines 35 and 36. This is your total tax. 37 1,368 00

38 Federal income tax withheld from Forms W-2 and 1099. 38 0

39 2010 estimated tax payments and amount applied from 2009 return. 39 0

40 Making work pay credit. Attach Schedule M. 40 0

41a Earned income credit (EIC). 41a 0

b Nontaxable combat pay election. 41b

42 Additional child tax credit. Attach Form 8812. 42 0

43 American opportunity credit from Form 8863, line 14. 43 0

44 Add lines 38, 39, 40, 41a, 42, and 43. These are your total payments. 44 0

45 If line 44 is more than line 37, subtract line 37 from line 44. This is the amount you overpaid. 45 0

**Refund**

46a Amount of line 45 you want refunded to you. If Form 8878 is attached, check here ☐ 46a

b Routing number  ☐ Type: ☐ Checking ☐ Savings

d Account number

47 Amount of line 45 you want applied to your 2011 estimated tax. 47

**Amount you owe**

48 Amount you owe. Subtract line 44 from line 37. For details on how to pay, see instructions. 48

49 Estimated tax penalty (see instructions). 49

**Third party designee**

Do you want to allow another person to discuss this return with the IRS (see instructions)? ☐ Yes. Complete the following. ☒ No

Designee's name  Phone no.  Personal identification number (PIN)

**Sign here**

Under penalties of perjury, I declare that I have prepared this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and accurately list all amounts and sources of income I received during the tax year. Declaration of preparer (other than the taxpayer) is based on all information of which the preparer has any knowledge.

Joint return? See page 13. ☐ Yes ☒ No

Keep a copy for your records.

Your signature  Date  Your occupation  Daytime phone number

Spouse's signature (if a joint return, both must sign).  Date  Spouse's occupation

Print preparer's name  Preparer's signature  Date  Check ☐ If self-employed ☐ PTIN

**Paid preparer use only**

Firm's name  Firm's address  Phone no.

Form 1040A (2010)

Exhibit # 14



Form 1040A Department of the Treasury—Internal Revenue Service **2011** (Use Only—Do not write or staple in this space.)

**OMB No. 1545-0047**

Your first name and initial: **Wafiyuddin S.** Last name: **Abdullah** Your social security number: **1 8 2 4 4 4 6 0**

If a joint return, spouse's first name and initial: Last name: Spouse's social security number: **1 8 1 8 1 9 9 3**

**Zakia** Apt. no.: **▲** Make sure the SSN(s) above and on line 6c are correct.

Home address (number and street), if you have a P.O. box, see instructions: **2801 N. 19th Street**

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions): **Philadelphia, Pa. 19132-4304**

Foreign country name: Foreign province/county: Foreign postal code:

**Filing status** Check only one box.  
 1 ☐ Single  
 2 ☒ Married filing jointly (even if only one had income)  
 3 ☐ Married filing separately. Enter spouse's SSN above and full name here: **▲**  
 4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here: **▲**  
 5 ☐ Qualifying widow(er) with dependent child (see instructions)

**Exemptions** 6a ☒ Yourself. If someone can claim you as a dependent, do not check box 6a.  
 b ☒ Spouse  
 c Dependents:  
 (1) First name Last name (2) Dependent's social security number (3) Dependent's relationship to you (4) ☒ If child under age 17 qualifying for child tax credit (see instructions)  
 Florie Z. Abdullah 203-28-5577 Daughter ☒  
 Add numbers on lines 6a through 6c: **3**

**d Total number of exemptions claimed.**

**Income**  
 7 Wages, salaries, tips, etc. Attach Form(s) W-2. **7 27,000 00**  
 8a Taxable interest. Attach Schedule B if required. **8a 0**  
 b Tax-exempt interest. Do not include on line 8a. **8b 0**  
 9a Ordinary dividends. Attach Schedule B if required. **9a 0**  
 b Qualified dividends (see instructions). **9b 0**  
 10 Capital gain distributions (see instructions). **10 0**  
 11a IRA distributions. 11a 11b Taxable amount (see instructions). **11b 0**  
 12a Pensions and annuities. 12a 7,581 12b Taxable amount (see instructions). **12b 7,581 00**  
 13 Unemployment compensation and Alaska Permanent Fund dividends. **13 0**  
 14a Social security benefits. 14a 14b Taxable amount (see instructions). **14b 0**  
 15 Add lines 7 through 14b (far right column). This is your total income. **15 34,581 00**

**Adjusted gross income**  
 16 Educator expenses (see instructions). **16 0**  
 17 IRA deduction (see instructions). **17 0**  
 18 Student loan interest deduction (see instructions). **18 0**  
 19 Tuition and fees. Attach Form 8917. **19 0**  
 20 Add lines 16 through 19. These are your total adjustments. **20 0**  
 21 Subtract line 20 from line 15. This is your adjusted gross income. **21 34,581 00**

For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see separate instructions. Cat. No. 11327A Form 1040A (2011)

Exhibit # 15

Form 1040A (2011)		Page 2	
<b>Tax, credits, and payments</b>	22 Enter the amount from line 21 (adjusted gross income).	22	34,581 00
<b>Standard Deduction for:</b> • People who check any box on line 23a or 23b or who can be claimed as a dependent, see instructions. • All others: Single or Married filing separately, \$5,800 Married filing jointly or Qualifying widow(er), \$11,600 Head of household, \$8,000	23a Check if <input type="checkbox"/> You were born before January 2, 1947, <input type="checkbox"/> Blind Total boxes <input type="checkbox"/> <input type="checkbox"/> Spouse was born before January 2, 1947, <input type="checkbox"/> Blind checked ▶ 23a		
	b If you are married filing separately and your spouse itemizes deductions, check here ▶ 23b <input type="checkbox"/>		
	24 Enter your standard deduction.	24	11,600 00
	25 Subtract line 24 from line 22. If line 24 is more than line 22, enter -0-.	25	22,981 00
	26 Exemptions. Multiply \$3,700 by the number on line 5d.	26	11,100 00
	27 Subtract line 26 from line 25. If line 26 is more than line 25, enter -0-. This is your taxable income.	▶ 27	11,881 00
	28 Tax, including any alternative minimum tax (see instructions).	28	1,193 00
	29 Credit for child and dependent care expenses. Attach Form 2441.	29	0
	30 Credit for the elderly or the disabled. Attach Schedule R.	30	0
	31 Education credits from Form 8863, line 23.	31	108 00
32 Retirement savings contributions credit. Attach Form 8880.	32	0	
33 Child tax credit (see instructions).	33	108 00	
34 Add lines 29 through 33. These are your total credits.	34	212 00	
35 Subtract line 34 from line 28. If line 34 is more than line 28, enter -0-. This is your total tax.	35	971 00	
36 Federal income tax withheld from Forms W-2 and 1099.	36	115 00	
37 2011 estimated tax payments and amount applied from 2010 return.	37	0	
38a Earned income credit (EIC).	38a	\$38 00	
b Nontaxable combat pay election.	38b		
39 Additional child tax credit. Attach Form 8812.	39	\$84 00	
40 American opportunity credit from Form 8863, line 14.	40		
41 Add lines 36, 37, 38a, 39, and 40. These are your total payments.	▶ 41	1,246 00	
42 If line 41 is more than line 35, subtract line 35 from line 41. This is the amount you overpaid.	42	275 00	
43a Amount of line 42 you want refunded to you. If Form 8888 is attached, check here ▶ 43a	43a	275 00	
<b>Refund</b>	b Routing number <input type="text"/> ▶ c Type: <input type="checkbox"/> Checking <input type="checkbox"/> Savings		
	d Account number <input type="text"/>		
Direct deposit? See instructions and fill in 43b, 43c, and 43d or Form 8888.	44 Amount of line 42 you want applied to your 2012 estimated tax.	44	0
<b>Amount you owe</b>	45 Amount you owe. Subtract line 41 from line 35. For details on how to pay, see instructions.	▶ 45	0
	46 Estimated tax penalty (see instructions).	46	0
<b>Third party designee</b>	Do you want to allow another person to discuss this return with the IRS (see instructions)? <input type="checkbox"/> Yes. Complete the following. <input checked="" type="checkbox"/> No		
<b>Sign here</b>	Designee's name _____ Phone no. _____ Personal identification number (PIN) _____		
	Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and accurately list all amounts and sources of income I received during the tax year. Declaration of preparer (other than the taxpayer) is based on all information of which the preparer has any knowledge.		
	Your signature _____ Date 3/12/2012 Your occupation Business Owner Daytime phone number 213-223-8440		
	Spouse's signature. If a joint return, both must sign. _____ Date 3/12/2012 Spouse's occupation Student & Food Service If the IRS sent you an Identity Protection Pin, enter it (see instructions) _____		
Paid preparer use only	Print/preparer's name _____ Preparer's signature _____ Date _____ Check <input type="checkbox"/> self-employed <input type="checkbox"/> PIN _____ Firm's name _____ Firm's address _____ Phone no. _____		

# Exhibit # 16

Form 1120		U.S. Corporation Income Tax Return		OMB No. 1545-0123	
Department of the Treasury Internal Revenue Service		For calendar year 2010 or tax year beginning 2010, ending 2010		2010	
A. Check if:		B. Employer identification number		C. Date incorporated	
1a Consolidated return (attach Form 980)		23-2408419		1986	
1b Life/annuity consolidated return				D Total assets (see instructions)	
2 Personal holding co. (attach S-98, Pt. II)				\$ 180,000 00	
3 Personal services corp. (see instructions)					
4 Schedule 1-2 attached		E Check if: (1) Initial return (2) Final return (3) Name change (4) Address change			
Name		Islamic Communication Network, Inc.			
Number, street, and room or suite no., if a P.O. box, see instructions.		2451 N. 19th Street			
City or town, state, and ZIP code		Philadelphia, PA 19122-4204			
1a Gross receipts or sales		23,500 00		b Less returns and allowances	
2 Cost of goods sold (Schedule A, line 8)				c Net	
3 Gross profit. Subtract line 2 from line 1c		23,500 00			
4 Dividends (Schedule C, line 10)		0			
5 Interest		0			
6 Gross rents		0			
7 Gross royalties		20,000 00			
8 Capital gain net income (attach Schedule D (Form 1120))		0			
9 Net gain or (loss) from Form 4797, Part II, line 17 (attach Form 4797)		0			
10 Other income (see instructions—attach schedule)		0			
11 Total income. Add lines 3 through 10.		43,500 00			
12 Compensation of officers (Schedule E, line 4)		23,000 00			
13 Salaries and wages (less employment credits)		3,500 00			
14 Repairs and maintenance		0			
15 Bad debts		0			
16 Rents		3,000 00			
17 Taxes and licenses		0			
18 Interest		0			
19 Charitable contributions		1,100 00			
20 Depreciation from Form 4562 not claimed on Schedule A or elsewhere on return (attach Form 4562)		0			
21 Depletion		0			
22 Advertising		1,500 00			
23 Pension, profit-sharing, etc., plans		0			
24 Employee benefit programs		0			
25 Domestic production activities deduction (attach Form 9903)		0			
26 Other deductions (attach schedule)		1,900 00			
27 Total deductions. Add lines 12 through 26.		41,000 00			
28 Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11.		2,500 00			
29 Less: a Net operating loss deduction (see instructions)		29a 0			
b Special deductions (Schedule C, line 20)		29b 0			
30 Taxable income. Subtract line 29a from line 28 (see instructions)		2,500 00			
31 Total tax (Schedule J, line 10)		375 00			
32a 2009 overpayment credited to 2010		32a 0			
b 2010 estimated tax payments		32b 0			
c 2010 refund applied for on Form 4466		32c 0			
d Tax deposited with Form 7004		32d 0			
e Credits: (1) Form 2432		32e 0			
(2) Form 4398		32f 0			
g Refundable credits from Form 3800, line 19c, and Form 8877, line 8a		32g 0			
33 Estimated tax penalty (see instructions). Check if Form 2220 is attached		33 0			
34 Amount owed. If line 32h is smaller than the total of lines 31 and 33, enter amount owed		34 375 00			
35 Overpayment. If line 32h is larger than the total of lines 31 and 33, enter amount overpaid		35 0			
36 Enter amount from line 35 you want credited to 2011 estimated tax		36 0			
37 Refunded		37 0			

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, this return, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Signature of officer: W. L. S. J. L. Date: 12/14/2012 Title: PREPARED / CEO

Print/Type preparer's name: \_\_\_\_\_ Preparer's signature: \_\_\_\_\_ Date: \_\_\_\_\_ Check ☐ if self-employed

Firm's name: \_\_\_\_\_ Firm's EIN: \_\_\_\_\_

Firm's address: \_\_\_\_\_ Phone no.: \_\_\_\_\_

For Paperwork Reduction Act Notice, see separate instructions. Oct. No. 114500 Form 1120 (2010)

Exhibit # 17



**Schedule A**      **Cost of Goods Sold (see instructions)**

1	Inventory at beginning of year	1	
2	Purchases	2	
3	Cost of labor	3	
4	Additional section 280A costs (attach schedule)	4	
5	Other costs (attach schedule)	5	
6	Total. Add lines 1 through 5	6	
7	Inventory at end of year	7	
8	Cost of goods sold. Subtract line 7 from line 6. Enter here and on lines 1, line 2	8	

9a Check all methods used for valuing closing inventory:

- (i) ☐ Cost  
(ii) ☐ Lower of cost or market  
(iii) ☐ Other (Specify method used and attach explanation.)

17 Check if there was a write-down of subnormal goods

Check if the LIFO inventory method was adopted this tax year for any goods (If checked, attach Form 970) ☐

d. If the LIFO inventory method was used for this tax year, enter percentage (or amount) of closing inventory computed under LIFO

4. If property is exercised or exercised for resale, do the rules of section 252A apply to the corporation? ☐ Yes ☐ No

4. Were there any changes in determinable quantities, cost, or valuations between opening and closing inventory? If "Yes,"

f. Was there any change in determining domestic, com., or exportable domestic spending and saving accounts? ☐ Yes ☒ No  
attach explanation

**Schedule C Dividends and Special Deductions (see instructions)**

		received	72	73
1	Dividends from less-than-20%-owned domestic corporations (other than debt-financed stock)	0	70	
2	Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock)		80	
3	Dividends on debt-financed stock of domestic and foreign corporations		50	
4	Dividends on certain preferred stock of less-than-20%-owned public utilities		42	
5	Dividends on certain preferred stock of 20%-or-more-owned public utilities		48	
6	Dividends from less-than-20%-owned foreign corporations and certain FSCs		70	
7	Dividends from 20%-or-more-owned foreign corporations and certain FSCs		80	
8	Dividends from wholly owned foreign subsidiaries		100	
9	Total. Add lines 1 through 8. See instructions for limitation			
10	Dividends from domestic corporations received by a small business investment company operating under the Small Business Investment Act of 1956		100	
11	Dividends from affiliated group members		100	
12	Dividends from certain FSCs		100	
13	Dividends from foreign corporations not included on lines 3, 6, 7, 8, 11, or 12			
14	Income from controlled foreign corporations under subpart F (attach Form(s) 5471)			
15	Foreign dividend gross-up			
16	IG-DISC and former DISC dividends not included on lines 1, 2, or 3			
17	Other dividends			
18	Deduction for dividends paid on certain preferred stock of public utilities			
19	Total dividends. Add lines 1 through 17. Enter here and on page 1, line 4	0		
20	Tax-exempt dividends. Add lines 9, 10, 11, 12, and 18. Enter here and on page 1, line 20b			

## Schedule E Compensation of Officers (see instructions for page 1, line 12)

Notes: Complete Schedule E only if total receipts (line 1a plus lines 4 through 10 on page 1) are \$500,000 or more.

(a) Name of officer	(b) Social security number	(c) Percent of time devoted to business	Percent of compensation, stock interest		(f) Amount of compensation
			(d) Dividends	(e) Preferred	
1 Wallyuddin S. Abdurrah	192-44-4450	100 %	41 %	55 %	25,000.00
		%	%	%	
		%	%	%	
		%	%	%	
		%	%	%	
2 Total compensation of officers					25,000.00
3 Compensation of officers claimed on Schedule A and elsewhere on return					
4 Subtract line 3 from line 2. Enter the result here and on page 1, line 12					25,000.00

Form 1120-2010

# Exhibit # 18

Form 1120 (2010)

Page 3

Schedule J Tax Computation (see instructions)				
1	Check if the corporation is a member of a controlled group (attach Schedule O (Form 1120))	<input type="checkbox"/>	2	375.00
2	Income tax. Check if a qualified personal service corporation (see instructions)	<input type="checkbox"/>	3	0
3	Alternative minimum tax (attach Form 4626)		4	375.00
4	Add lines 2 and 3			
5a	Foreign tax credit (attach Form 1116)	0		
5b	Credit from Form 8804, line 29	0		
5c	General business credit (attach Form 8805)	0		
5d	Credit for prior year minimum tax (attach Form 8827)	0		
5e	Bond credits from Form 8912	0		
6	Total credits. Add lines 5a through 5e		6	375.00
7	Subtract line 6 from line 4		7	
8	Personal holding company tax (attach Schedule PH (Form 1120))		8	
9	Other taxes. Check if front: <input type="checkbox"/> Form 4255 <input type="checkbox"/> Form 5611 <input type="checkbox"/> Form 9907 <input type="checkbox"/> Form 2868 <input type="checkbox"/> Form 9902 <input type="checkbox"/> Other (attach schedule)		9	
10	Total tax. Add lines 7 through 9. Enter here and on page 1, line 31		10	375.00

Schedule K Other information (see instructions)		Yes	No
1	Check accounting method: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Accrual <input type="checkbox"/> Other (specify) _____		
2	See the instructions and enter the:		
a	Business activity code(s): _____		
b	Business activity: 1310		
c	Product or service: 1310		
3	Is the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? If "Yes," enter name and EIN of the parent corporation: _____		✓
4	At the end of the tax year:		
a	Did any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, or tax-exempt organization own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote? If "Yes," complete Part I of Schedule G (Form 1120) (attach Schedule G).		✓
b	Did any individual or estate own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote? If "Yes," complete Part II of Schedule G (Form 1120) (attach Schedule G).		✓
5	At the end of the tax year, did the corporation:		
a	Own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of stock entitled to vote of any foreign or domestic corporation not included on Form 981, Affiliated Schedule? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv).		✓

(i) Name of Corporation	(ii) Employer Identification Number (if any)	(iii) Country of Incorporation	(iv) Percentage Owned in Voting Stock

Form 1120 (2010)

Exhibit # 19

Form 1120 (2010)		Page 4
Schedule K <i>Continued</i>		
<p><b>b</b> Own directly an interest of 20% or more, or own, directly or indirectly, an interest of 50% or more in any foreign or domestic partnership (including an entity treated as a partnership) or in the beneficial interest of a trust? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv).</p>		<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>
<b>(i) Name of Entity</b>	<b>(ii) Employer Identification Number (if any)</b>	<b>(iii) Country of Organization</b>
		<b>(iv) Maximum Percentage Owned in Profit, Loss, or Capital</b>
<p><b>6</b> During this tax year, did the corporation pay dividends (other than stock dividends and distributions in exchange for stock) in excess of the corporation's current and accumulated earnings and profits? (See sections 301 and 315.)</p> <p>If "Yes," file Form 5422, Corporate Report of Nondividend Distributions.</p> <p>If this is a consolidated return, answer here for the parent corporation and on Form 951 for each subsidiary.</p>		<p><input type="checkbox"/> <input checked="" type="checkbox"/></p>
<p><b>7</b> At any time during the tax year, did one foreign person own, directly or indirectly, at least 25% of (a) the total voting power of all classes of the corporation's stock entitled to vote or (b) the total value of all classes of the corporation's stock? For rules of attribution, see section 318. If "Yes," enter:</p> <p>(i) Percentage owned: <u>                    </u> and (ii) Owner's country: <u>                    </u></p> <p>(c) The corporation may have to file Form 5472, Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business. Enter the number of Forms 5472 attached: <u>                    </u></p>		<p><input type="checkbox"/> <input checked="" type="checkbox"/></p>
<p><b>8</b> Check this box if the corporation issued publicly offered debt instruments with original issue discount <u>                    </u> <input type="checkbox"/></p> <p>If checked, the corporation may have to file Form 8281, Information Return for Publicly Offered Original Issue Discount Instruments.</p>		<p><input type="checkbox"/> <input checked="" type="checkbox"/></p>
<p><b>9</b> Enter the amount of tax-exempt interest received or accrued during the tax year: <u>                    </u></p>		
<p><b>10</b> Enter the number of shareholders at the end of the tax year (N 100 or fewer): <u>                    </u></p>		
<p><b>11</b> If the corporation has an NOL for the tax year and is electing to forego the carryback period, check here <u>                    </u> <input type="checkbox"/></p> <p>If the corporation is filing a consolidated return, the statement required by Regulations section 1.1602-21(b)(3) must be attached or the election will not be valid.</p>		<p><input type="checkbox"/> <input checked="" type="checkbox"/></p>
<p><b>12</b> Enter the available NOL carryover from prior tax years (do not reduce it by any deduction on line 29a): <u>                    </u></p>		
<p><b>13</b> Are the corporation's total receipts (line 1a plus lines 4 through 10 on page 1) for the tax year and its total assets at the end of the tax year less than \$250,000? <u>                    </u></p> <p>If "Yes," the corporation is not required to complete Schedules L, M-1, and M-2 on page 5. Instead, enter the total amount of cash distributions and the book value of property distributions (other than cash) made during the tax year: <u>                    </u></p>		<p><input checked="" type="checkbox"/> <input type="checkbox"/></p>
<p><b>14</b> Is the corporation required to file Schedule UTP (Form 1120), Unrelated Tax Position Statement (see instructions)? <u>                    </u></p> <p>If "Yes," complete and attach Schedule UTP.</p>		<p><input type="checkbox"/> <input checked="" type="checkbox"/></p>

Form 1120 (2010)

# Exhibit # 20

Form 1120 (2010)

Page 5

Schedule C Balance Sheets per Books		Beginning of tax year		End of tax year	
Assets		(a)	(b)	(c)	(d)
1	Cash				
2a	Trade notes and accounts receivable				
b	Less allowance for bad debts				
3	Inventories				
4	U.S. government obligations				
5	Tax-exempt securities (see instructions)				
6	Other current assets (attach schedule)				
7	Loans to shareholders				
8	Mortgage and real estate loans				
9	Other investments (attach schedule)				
10a	Buildings and other depreciable assets				
b	Less accumulated depreciation				
11a	Depreciable assets				
b	Less accumulated depreciation				
12	Land (net of any amortization)				
13a	Intangible assets (amortizable only)				
b	Less accumulated amortization				
14	Other assets (attach schedule)				
15	<b>Total assets</b>				
<b>Liabilities and Shareholders' Equity</b>					
16	Accounts payable				
17	Mortgages, notes, bonds payable in less than 1 year				
18	Other current liabilities (attach schedule)				
19	Loans from shareholders				
20	Mortgages, notes, bonds payable in 1 year or more				
21	Other liabilities (attach schedule)				
22	Capital stock: a Preferred stock				
	b Common stock				
23	Additional paid-in capital				
24	Retained earnings—Appropriated (attach schedule)				
25	Retained earnings—Unappropriated				
26	Adjustments to shareholders' equity (attach schedule)				
27	Less cost of treasury stock				
28	<b>Total liabilities and shareholders' equity</b>				

**Schedule M-1 Reconciliation of Income (Loss) per Books With Income per Return**

Note: Schedule M-3 required instead of Schedule M-1 if total assets are \$10 million or more—see instructions.

1	Net income (loss) per books		7	Income recorded on books this year not included on this return (itemize): Tax-exempt interest \$	
2	Federal income tax per books				
3	Excess of capital losses over capital gains		8	Deductions on this return not charged against book income this year (itemize):	
4	Income subject to tax not recorded on books this year (itemize):		a	Depreciation \$	
			b	Charitable contributions \$	
5	Expenses recorded on books this year not deducted on this return (itemize):				
a	Depreciation \$		9	Add lines 7 and 8	
b	Charitable contributions \$				
c	Travel and entertainment \$		10	Income (page 1, line 28) — line 9 less line 9	
6	Add lines 1 through 5				

**Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (Line 25, Schedule L)**

1	Balance at beginning of year		5	Distributions: a Cash	
2	Net income (loss) per books			b Stock	
3	Other increases (itemize):			c Property	
			6	Other decreases (itemize):	
			7	Add lines 5 and 6	
4	Add lines 1, 2, and 3		8	Balance at end of year (line 4 less line 7)	

Form 1120 (2010)

Exhibit # 21

**Line 26 - Schedule (2010)****Overall Company's Cost:**

•Office Equipment & Supplies	\$480.00
•Phone & Internet Services	\$1,070.00
•Postage	\$120.00
•Misc. Expenses	\$230.00

**Total Expenses: \$1,900.00**

**Exhibit # 22**



**1120** U.S. Corporation Income Tax Return  
For calendar year 2011 or tax year beginning 2011, ending 2011

OMB No. 1545-0045

Department of the Treasury Internal Revenue Service

See separate instructions.

**A. Check if:**  
1a Consolidated return (attach Form 990) ☐  
1b Life/non-life consolidated return ☐  
2 Personal holding co. (attach Form 970) ☐  
3 Personal service corp. (see instructions) ☐  
4 Schedule M-1 attached ☐

**B. Check if:** (1) ☐ Initial return (2) ☐ Final return (3) ☐ Name change (4) ☐ Address change

**Name:** Islamic Communication Network, Inc.  
**Number, street, and room or suite no. If a P.O. box, see instructions:** 2481 N. 10th Street  
**City or town, state, and ZIP code:** Philadelphia, Pa. 19122-4304

**Employer Identification number:** 23-2408419  
**Date incorporated:** 1998  
**Total assets (see instructions):** \$ 200,000 00

**Income:**  
1a Merchant card and third-party payments. For 2011, enter -0-  
1b Gross receipts or sales not reported on line 1a (see instructions) 18,500 00  
1c Total. Add lines 1a and 1b 18,500 00  
1d Returns and allowances plus any other adjustments (see instructions) 0  
2 Cost of goods sold from Form 1125-A, line 8 (attach Form 1125-A)  
3 Gross profit. Subtract line 2 from line 1b  
4 Dividends (Schedule C, line 18)  
5 Interest  
6 Gross rents  
7 Gross royalties  
8 Capital gain net income (attach Schedule D (Form 1120))  
9 Net gain or (loss) from Form 4797, Part II, line 17 (attach Form 4797)  
10 Other income (see instructions—attach schedule)  
11 Total income. Add lines 1d through 10 46,500 00  
12 Compensation of officers from Form 1125-E, line 4 (attach Form 1125-E) 27,000 00  
13 Salaries and wages (less employment credits)  
14 Repairs and maintenance  
15 Bad debts  
16 Rents  
17 Taxes and licenses  
18 Interest  
19 Charitable contributions  
20 Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562)  
21 Depletion  
22 Advertising  
23 Pension, profit-sharing, etc., plans  
24 Employee benefit programs  
25 Domestic production activities deduction (attach Form 990)  
26 Other deductions (attach schedule)  
27 Total deductions. Add lines 12 through 26 44,400 00  
28 Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11 2,100 00  
29a Net operating loss deduction (see instructions) 0  
29b Special deductions (Schedule C, line 20) 0  
29c Add lines 29a and 29b 0  
30 Taxable income. Subtract line 29c from line 28 (see instructions) 2,100 00  
31 Total tax (Schedule J, Part I, line 11) 515 00  
32 Total payments and refundable credits (Schedule J, Part II, line 21)  
33 Estimated tax penalty (see instructions). Check if Form 2220 is attached  
34 Amount owed. If line 32 is smaller than the total of lines 31 and 33, enter amount owed 515 00  
35 Overpayment. If line 32 is larger than the total of lines 31 and 33, enter amount overpaid 0  
36 Enter amount from line 35 you want credited to 2012 estimated tax ☐ Refunded ☐

**Deductions (see instructions for limitations on deductions):**  
12 Compensation of officers from Form 1125-E, line 4 (attach Form 1125-E)  
13 Salaries and wages (less employment credits)  
14 Repairs and maintenance  
15 Bad debts  
16 Rents  
17 Taxes and licenses  
18 Interest  
19 Charitable contributions  
20 Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562)  
21 Depletion  
22 Advertising  
23 Pension, profit-sharing, etc., plans  
24 Employee benefit programs  
25 Domestic production activities deduction (attach Form 990)  
26 Other deductions (attach schedule)  
27 Total deductions. Add lines 12 through 26  
28 Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11  
29a Net operating loss deduction (see instructions)  
29b Special deductions (Schedule C, line 20)  
29c Add lines 29a and 29b

**Use refundable credits and payments:**  
30 Taxable income. Subtract line 29c from line 28 (see instructions)  
31 Total tax (Schedule J, Part I, line 11)  
32 Total payments and refundable credits (Schedule J, Part II, line 21)  
33 Estimated tax penalty (see instructions). Check if Form 2220 is attached  
34 Amount owed. If line 32 is smaller than the total of lines 31 and 33, enter amount owed  
35 Overpayment. If line 32 is larger than the total of lines 31 and 33, enter amount overpaid  
36 Enter amount from line 35 you want credited to 2012 estimated tax ☐ Refunded ☐

**Sign Here:** W. L. S. [Signature] 12-7-2012 PRESIDENT/CEO  
Signature of officer Date Title

**Paid Preparer Use Only:**  
Print/type preparer's name Preparer's signature Date Check ☐ if self-employed  
Firm's name Firm's EIN  
Firm's address Phone no.

For Paperwork Reduction Act Notice, see separate instructions. Cat. No. 11480C Form 1120 (2011)

Exhibit # 23

Form 1120 (2011)

Page 2

Schedule C Dividends and Special Deductions (see instructions)		(a) Dividends received	(b) %	(c) Special deductions (a) x (b)
1	Dividends from less-than-20%-owned domestic corporations (other than debt-financed stock)	0	70	0
2	Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock)		80	
3	Dividends on debt-financed stock of domestic and foreign corporations		see instructions	
4	Dividends on certain preferred stock of less-than-20%-owned public utilities		42	
5	Dividends on certain preferred stock of 20%-or-more-owned public utilities		48	
6	Dividends from less-than-20%-owned foreign corporations and certain FSCs		70	
7	Dividends from 20%-or-more-owned foreign corporations and certain FSCs		80	
8	Dividends from wholly owned foreign subsidiaries		100	
9	Total. Add lines 1 through 8. See instructions for limitation			0
10	Dividends from domestic corporations received by a small business investment company operating under the Small Business Investment Act of 1988	0	100	0
11	Dividends from affiliated group members	0	100	0
12	Dividends from certain FSCs	0	100	0
13	Dividends from foreign corporations not included on lines 6, 7, 8, 11, or 12	0		
14	Income from controlled foreign corporations under subpart F (attach Form(s) 5471)	0		
15	Foreign dividend gross-up	0		
16	10-DISC and former DISC dividends not included on lines 1, 2, or 3	0		
17	Other dividends	0		
18	Deduction for dividends paid on certain preferred stock of public utilities			0
19	Total dividends. Add lines 1 through 17. Enter here and on page 1, line 4	0		
20	Total special deductions. Add lines 9, 10, 11, 12, and 18. Enter here and on page 1, line 20b			0

Form 1120 (2011)

Exhibit # 24

Page 1 of 20

# Exhibit # 25



Form 1120 (2011)

Page 4

**Schedule K Other Information** *continued (see instructions)*

5 At the end of the tax year, did the corporation:

- a Own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of stock entitled to vote of any foreign or domestic corporation not included on Form 991, Affiliations Schedule? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv) below.

(i) Name of Corporation	(ii) Employer Identification Number (if any)	(iii) Country of Incorporation	(iv) Percentage Owned in Voting Stock

- b Own directly an interest of 20% or more, or own, directly or indirectly, an interest of 50% or more in any foreign or domestic partnership (including an entity treated as a partnership) or in the beneficial interest of a trust? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv) below.

(i) Name of Entity	(ii) Employer Identification Number (if any)	(iii) Country of Organization	(iv) Maximum Percentage Owned in Profit, Loss, or Capital

6 During this tax year, did the corporation pay dividends (other than stock dividends and distributions in exchange for stock) in excess of the corporation's current and accumulated earnings and profits? (See sections 301 and 316.)

If "Yes," file Form 9432, Corporate Report of Nondividend Distributions.

If this is a consolidated return, answer here for the parent corporation and on Form 951 for each subsidiary.

7 At any time during the tax year, did one foreign person own, directly or indirectly, at least 25% of (a) the total voting power of all classes of the corporation's stock entitled to vote or (b) the total value of all classes of the corporation's stock?

For rules of attribution, see section 318. If "Yes," enter:

(i) Percentage owned \_\_\_\_\_ and (ii) Owner's country \_\_\_\_\_

(c) The corporation may have to file Form 5472, Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business. Enter the number of Forms 5472 attached: \_\_\_\_\_

8 Check this box if the corporation issued publicly offered debt instruments with original issue discount. ☐

If checked, the corporation may have to file Form 8281, Information Return for Publicly Offered Original Issue Discount Instruments.

9 Enter the amount of tax-exempt interest received or accrued during the tax year: \$ \_\_\_\_\_

10 Enter the number of shareholders at the end of the tax year (if 100 or fewer): \_\_\_\_\_

11 If the corporation has an NOL for the tax year and is electing to forgo the carryback period, check here: ☐

If the corporation is filing a consolidated return, the statement required by Regulations section 1.1502-21(b)(3) must be attached or the election will not be valid.

12 Enter the available NOL carryover from prior tax years (do not reduce it by any deduction on line 29a): \$ \_\_\_\_\_

13 Are the corporation's total receipts (line 1c plus lines 4 through 10 on page 1) for the tax year and its total assets at the end of the tax year less than \$260,000? ☐

If "Yes," the corporation is not required to complete Schedule L, M-1, and M-2 on page 5. Instead, enter the total amount of cash distributions and the book value of property distributions (other than cash) made during the tax year: \$ \_\_\_\_\_

14 Is the corporation required to file Schedule UTP (Form 1120), Uncertain Tax Position Statement (see instructions)? ☐

If "Yes," complete and attach Schedule UTP.

15a Did the corporation make any payments in 2011 that would require it to file Form(s) 1099 (see instructions)? ☐

b If "Yes," did or will the corporation file all required Form(s) 1099? ☐

Form 1120 (2011)

**Exhibit # 26**

Form 1120 (2011)

Page 5

Schedule M-1 Balance Sheets per Books		Beginning of tax year		End of tax year	
Assets		(a)	(b)	(c)	(d)
1	Cash				
2a	Trade notes and accounts receivable				
b	Less allowance for bad debts				
3	Inventories				
4	U.S. government obligations				
5	Tax-exempt securities (see instructions)				
6	Other current assets (attach schedule)				
7	Loans to shareholders				
8	Mortgage and real estate loans				
9	Other investments (attach schedule)				
10a	Buildings and other depreciable assets				
b	Less accumulated depreciation				
11a	Depletable assets				
b	Less accumulated depletion				
12	Land (net of any amortization)				
13a	Intangible assets (amortizable only)				
b	Less accumulated amortization				
14	Other assets (attach schedule)				
15	Total assets				
Liabilities and Shareholders' Equity					
16	Accounts payable				
17	Mortgages, notes, bonds payable in less than 1 year				
18	Other current liabilities (attach schedule)				
19	Loans from shareholders				
20	Mortgages, notes, bonds payable in 1 year or more				
21	Other liabilities (attach schedule)				
22	Capital stock: a Preferred stock				
	b Common stock				
23	Additional paid-in capital				
24	Retained earnings—Appropriated (attach schedule)				
25	Retained earnings—Unappropriated				
26	Adjustments to shareholders' equity (attach schedule)				
27	Less cost of treasury stock				
28	Total liabilities and shareholders' equity				

**Schedule M-1 Reconciliation of Income (Loss) per Books With Income per Return**  
 Note: Schedule M-3 required instead of Schedule M-1 if total assets are \$10 million or more—see instructions.

1	Net income (loss) per books		7	Income recorded on books this year not included on this return (itemize):	
2	Federal income tax per books			Tax-exempt interest \$	
3	Excess of capital losses over capital gains				
4	Income subject to tax not recorded on books this year (itemize):				
5	Expenses recorded on books this year not deducted on this return (itemize):		8	Deductions on this return not charged against book income this year (itemize):	
a	Depreciation \$		a	Depreciation \$	
b	Charitable contributions \$		b	Charitable contributions \$	
c	Travel and entertainment \$				
6	Add lines 1 through 5		9	Add lines 7 and 8	
			10	Income (page 1, line 28)—(line 6 less line 9)	

**Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (Line 25, Schedule 1)**

1	Balance at beginning of year		4	Distributions: a Cash	
2	Net income (loss) per books			b Stock	
3	Other increases (itemize):			c Property	
			5	Other decreases (itemize):	
4	Add lines 1, 2, and 3		6	Add lines 4 and 5	
			7	Balance at end of year (line 4 less line 6)	

Form 1120 (2011)

Exhibit # 27

**Line 26 - Schedule (2011)****Overall Company's Cost:**

•Office Equipment & Supplies	\$360.00
•Phone & Internet Services	\$1,200.00
•Postage	\$120.00
•Misc. Expenses	\$230.00
•Transportation	\$590.00

**Total Expenses: \$2,500.00**

**Exhibit # 28**

3/28/13

Outlook Print Message

**Automatic reply: Loan Proposal**

From: **David, Justin** (justin.david@bankofamerica.com) This sender is in your contact list.  
Sent: Fri 12/28/12 3:15 PM  
To: **Waliyyuddin Abdullah** (waliyyuddin@hotmail.com)

I am out the office on December 22nd - January 1st. If urgent, please call my cell phone at 267.644.6632 and I will respond as soon as possible.

*For immediate customer service needs, dial 1.888.BUSINESS*

**Exhibit # 29**

Page 1 of 1

**WBQI fm**

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From: "WBQI fm" <wbqifm@hotmail.com>  
Date: Tuesday, June 24, 2014 3:08 PM  
To: <justin.davids@bankofamerica.com>  
Attach: PROJECT SEEDLING OUTLINE.pdf  
Subject: Project Seedling Loan Request

Mr. Davids:

I have a non-profit corporation that is just three years old. I have business experience from my profit corporation of over 28 years. The FCC has granted my non-profit corporation a permit to build a Low Power FM Radio Station in Delaware. I am looking for financing (\$125,000.00) to help build this station. I have attached a copy of this Project, Project Seedling, to this e-mail. Would you look this outline over and if it is something that your bank can work with, would you please contact me.

Sincerely;

Mr. Abdullah

**Exhibit # 30**

[Print](#)

Subject: Loan Request

From: <islamiccomm.network@verizon.net>

Sent: Aug 4, 2014 08:59:44 AM

To: justin.davids@bankofamerica.com

Mr. Davids:

Here is the information I was talking about.

Wahyuddin S. Abdullah

Exhibit # 31

Page 1 of 1



Print

Subject: Initial information for SBA Loan review

From: &lt;Brendan.McMoran@wellsfargo.com&gt;

Sent: Sep 4, 2013 11:30:11 AM

To: islamiccomm.network@verizon.net

CC: walker.dugan@wellsfargo.com

Hi Mr. Abdullah,

It was great speaking with you this morning and hearing about the project. Below is the list of initial information I mention on the call. Once I receive all of these items I will run my cash flow analysis prepare a Proposal of Loan terms.

If you have any questions, please feel free to call or email me.

**Information Required for ALL SBA Loan Prequalification Requests:**

1. Applicant's Personal Tax Returns for last 3 years. (Anyone that will be greater than 20% owner)
2. Applicant's Personal Financial Statement (Please use SBA form attached).
3. Applicant's Statement of Personal History (SBA form 912) - use form attached.
4. Current Income Statement & Balance Sheet for Business through 6/30/13.
5. Tax Returns for Last 3 Years for the Business.
6. Business Debt Schedule - use form attached.

Regards,  
Brendan

**Brendan McMoran**  
Business Development Officer

Wells Fargo SBA Lending | 2840 Butler Pike | Plymouth Meeting PA 19062  
MAC Y1466-613  
Tel: 610-397-2564 | Cell: 610-312-5727 | Fax: 610-6659127

brendan.mcmoran@wellsfargo.com

This message may contain confidential and/or unclassified information. If you are not the addressee or authorized to receive this for the addressee, you must not use, copy, disclose, or take any other action on the message or any information herein. If you have received this message in error, please inform the sender immediately by reply e-mail and delete this message. Thank you for your cooperation.



Walker Dugan  
Personal Banker  
NMLS ID: 770137

Centre Square  
MAC Y1367-010  
1870 Market Street  
Philadelphia, PA 19102  
Tel: 215 573 3151  
Fax: 215 786 5978

walker.dugan@wellsfargo.com

Wells Fargo Bank, N.A.

# Exhibit # 32

<https://netmail.verizon.net/webmail/driver?nimist=deggeternail&fu=INBOX&page=2&deg...> 9/4/2013



Print

Subject: Completed Information for SBA Loan Review

From: <islamiccomm.network@verizon.net>

Sent: Sep 9, 2013 08:13:08 AM

To: brendan.memoran@wellsfargo.com

CC: walker.dugan@wellsfargo.com

Hello Brendan:

Here is the completed information that you asked for for my loan review. Also, in talking with you last week, I forgot to mention that I was also looking to borrow some money to purchase the printing equipment, printing supplies, office and relate business equipment. The full breakdown of my requested loan amount is as follows: (1) \$350,000.00 to purchase property, (2) \$75,000.00 renovation cost and (3) \$75,000.00 for printing and all related business equipment.

You will also note that my attached business debt schedule is empty. That is because I do not have any business debt at this time.

Waliyyuddin S. Abdullah

Exhibit # 33





Print

Subject: Raising Capital

From: &lt;islamiccomm.network@verizon.net&gt;

Sent: Sep 28, 2013 12:06:53 PM

To: brendan.memoran@wellsfargo.com

CC: walker.dugan@wellsfargo.com

Hello Brendan:

I am working on a plan to sell stock in my company. I hope to raise all of the funds needed to go forward with the business loan that I am requesting from your bank. I will have my first initial public offering within 30 days, for the sale of my stock. After this first public offering, I will be contacting you again.

Waliyyuddin S. Abdullah

Exhibit # 34



Print

Subject: Further Work

From: &lt;Islamiccomm.network@verizon.net&gt;

Sent: Nov 4, 2013 06:49:08 AM

To: brendan.memoran@wellsfargo.com

CC: walker.dugan@wellsfargo.com

Hello Brendan:

I just wanted to let you know that you have helped my understanding about what I need to do to move my business forward. I was given the wrong information and I had the wrong impression about business bank loans. You have corrected those mistakes. When I have the cash flow to support my loan request then, you will be hearing from me again. Again, thanks for the good, sound and honest business advice.

Waliyyuddin S. Abdullah

Exhibit # 35



Print

Subject: New Loan Request

From: <islamicom.network@verizon.net>

Sent: Dec 9, 2013 10:47:34 AM

To: brendan.mcmoran@wellsfargo.com

CC: walker.dugan@wellsfargo.com

Hello Brendan:

I fully understand why I did not qualify for that first loan amount of \$500,000.00. Now I would like to request a business loan of just \$25,000.00, still under the Patriot Express program of the SBA. Would you send me the forms needed for applying for this loan.

Thanks;

Waliyyuddin S. Abdullah

Exhibit # 35



Print

Subject: Loan Request

From: <Islamicecomm.network@verizon.net>

Sent: Aug 6, 2014 02:03:36 PM

To: brendan.mamoran@wellsfargo.com

CC: walker.dugan@wellsfargo.com

Mr. McMoorean:

I am still in need of a business loan. Would you provide me with the information that I need in order to apply for a business loan.

Sincerely,

Wahyyuddin S. Abdullah

Exhibit # 37